

**To:** Barton, Dana[Barton.Dana@epa.gov]  
**Cc:** Wirtschafter, Joshua[Wirtschafter.Joshua@epa.gov]; Riley, Gary[riley.gary@epa.gov]; Sandoval, Angela[Sandoval.Angela@epa.gov]  
**From:** Halsey, Ronald H  
**Sent:** Fri 9/8/2017 6:26:54 PM  
**Subject:** RE: Leviathan Mine - RPM transition and q's

Dana,

Please see responses embedded in your original e-mail below. Don't hesitate to call me with any questions on the responses.

I have one question as well. It is in regards to our August 28, 2017, response letter to the Reference Area Work Plan, Revision No. 1. It is critical that we receive resolution from EPA on the statistics question around the Reference Threshold Values. I understand this is a pretty detailed technical issue and will take Gary or others some time to study and understand. We stated in the August 28<sup>th</sup> letter that we were proceeding with the statistical method we proposed back in July 2015. However, if EPA ultimately will not accept our proposed statistical method after considering our detailed response on the issue, we need to understand this as soon as possible. It will have a significant impact on the schedule.

Thanks and have a great weekend.

***Ron Halsey***

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**From:** Barton, Dana [mailto:Barton.Dana@epa.gov]  
**Sent:** Thursday, September 07, 2017 12:09 PM  
**To:** Halsey, Ronald H  
**Cc:** Wirtschafter, Joshua; Riley, Gary; Sandoval, Angela  
**Subject:** Leviathan Mine - RPM transition and q's

Hi Ron,

I'm working with Superfund management to identify a new Project Manager for the Leviathan site. During the transition, Gary Riley and I will continue to work to keep things moving at the site as best we can! I do have a list of items that I need your assistance or response to:

1. Given the timing of transitioning a new project manager to the site, I recommend delaying the Lean project until the new RPM has come up to speed. Would a delayed start for Lean be acceptable for the ARC team? What dates would you propose? We agree that a delay in starting LEAN is appropriate. I would suggest that Angela continue her pre-work in gathering information from the various stakeholders that will be participating in the first meeting. I think it is too early to select a date until you've had an opportunity to assign a new PM to the project and they start getting up to speed. Let's circle back in a couple weeks to see if we can start identifying potential meeting dates.
2. Are you my primary contact (during this transition)? I think this is the simplest interim approach. You will be receiving documents and correspondences from our Project Manager, Tony Brown, or from AMEC on behalf of Tony. If there are questions or issues, don't hesitate to reach out to me.
3. Lynda was coordinating a site tour with the Washoe Tribe leadership, RWQCB and Stakeholders for next week. The tribe has offered Oct. 2, 3, 9 or 10 as alternative dates for the tour. Do these days work for ARC/BP? My understanding of these tours is that EPA typically leads the tour and the Water Board and AR/AMEC provide back-up for technical questions. We are assuming this will be the same format, but please advise if you think we need to do something different for this tour. Our preference would be October 3<sup>rd</sup> or 10<sup>th</sup>. While we can make October 2<sup>nd</sup> or 10<sup>th</sup> work if absolutely necessary, it requires staff to travel on Sunday in order to be there for a Monday tour.
4. I will send a separate response to ARC's question of whether to proceed based on a conditional approval of July 20 re: Task Sampling and Analysis Plan (TSAP) for Bioaccessibility Testing related to the Final Baseline Human Health Risk Assessment. Thank you.
5. We will be sending a consultation and clarification letter to the California SHPO, Nevada SHPO, and Washoe Tribe. We will coordinate that letter with you to ensure that it meets the needs of the proposed field work. Thank you. I believe this issue is related to EPA required hydrocarbon sampling in the Isabell Camp area. I would point out that in our February 26, 2016, letter to EPA regarding the On-Property FRI Work Plan Amendment 12, TSAP for Hydrocarbon Sampling, AR provided comments that we do not believe that the hydrocarbon sampling should be extended to the Isbell Camp area without evidence that hydrocarbons are present in the area. All other hydrocarbon sampling in other areas has been completed.

Thank you,

Dana

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Dana Barton

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